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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 846)

MARTIN MITCHELL,  
also known as "Marty,"

Defendant.

2-0202M

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GERARD J. RICCIARDI, being duly sworn, deposes and states that he is a Special Agent with the Internal Revenue Service ("IRS"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between September 2012 and the present, within the Eastern District of New York and elsewhere, the defendant MARTIN MITCHELL, also known as "Marty," together with others, did knowingly and intentionally conspire to distribute a controlled substance, which offense involved a substance containing Heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 846 and 841(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I have been a Special Agent with the IRS for approximately twenty-two years and have been assigned to the Drug

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<sup>1/</sup> Because the purpose of this affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Enforcement Administration Task Force for approximately five years. My information in this case comes from interviews, conversations with witnesses and other law enforcement officers, and my own participation in this investigation.

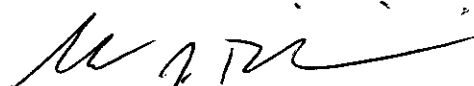
2. In May 2012, the DEA began an investigation into heroin trafficking on Long Island.

3. On March 5, 2013, the DEA executed a search warrant at 46 Davidson Street, Wyandanch, New York, which was authorized by the Honorable Arlene R. Lindsay on February 26, 2013.

4. Inside of the Davidson Street location, and in a vehicle parked in the rear of that location, agents seized approximately 150 bundles of heroin, approximately 1,500 individual "hits."

5. The defendant MARTIN MITCHELL was present inside of the Davidson Street location and acknowledged that he and another individual were "business partners" in the heroin trade and have been selling heroin from the Davidson Street location for the past six months.

WHEREFORE, your deponent respectfully requests the defendant MARTIN MITCHELL be dealt with according to law.

  
GERARD J. RICCIARDI  
Special Agent - IRS/DEA

Sworn to before me this  
6th day of March, 2013

  
/s/ E. THOMAS BOYLE MJ

THE HONORABLE E. THOMAS BOYLE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK